

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE:) **Case No: 23-41881**
)
KIM Y JACKSON) **Chapter 13**
)
)
Debtor)

TRUSTEE'S OBJECTION TO MOTION TO EXTEND AUTOMATIC STAY

Comes now Diana S. Daugherty, Standing Chapter 13 Trustee, and states as follows:

The Trustee submits Debtor has not filed the present case in good faith in that Debtor has not properly filed all required documents: (A) Debtor's B122C-1 form states she had no income of any kind (including gross business income) during the six full months prior to filing the bankruptcy petition (November 2022 through April 2023) yet Debtor provided the Trustee with a statement under penalty of perjury stating she had self employment income of \$15,000 during the 60 days prior to filing the bankruptcy petition. Debtor has also filed an attachment to schedule I claiming she grosses \$50,000 per month and nets \$7,000 from her business. Debtor's 2022 tax return shows over \$400,000 gross income. It appears the B122C-1 form was not completed or was not accurately completed. (B) Based on county records searches, Debtor failed to schedule ownership of real estate at 3317 Michigan and incorrectly states her corporation owns real estate at 5947 Hamilton when Debtor personally owns the property. In addition, although Debtor discloses some real estate owned by her corporation, she fails to disclose two of the parcels the corporation owns: 10112 Earl and 10012 Empire.

Dated: June 23, 2023
RSPGEN--DSD

/s/ Diana S. Daugherty
Diana S. Daugherty
Standing Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143
(314) 781-8100 Fax: (314) 781-8881
trust33@ch13stl.com

23-41881

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AUTOMATIC STAY**

**06/23/2023
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on June 23, 2023, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on June 23, 2023.

KIM Y JACKSON
5947 HAMILTON TERRACE
SAINT LOUIS, MO 63112

/s/ Diana S. Daugherty
Diana S. Daugherty